

Exhibit 28

Case Summary



Money laundering disclosure				
Case Summary	Record Data	Subject Data	Notes & Conclusion	Key Corresp
Incident Data				
Control Authority	Payment Operations	Status	Open Source: [GK2:666814]	
Review Date		by		
Remote Delivery Channel	N	High Profile	Y 17 Jun 2002 00:00	
Created on	17 Jun 2002 00:00	by	RBS_Mcomcl	
Last Modified on	17 Sep 2003 00:00	by	RBS_Ohearaa	
Linked Cases				
Address 276995 auto-linked				
617044 NONE				
666593 NONE				
Account 704079 auto-linked				
Address 708047 auto-linked				
710368 NONE				
Address 753294 auto-linked				
Address 772682 auto-linked				
Personal 1748664 auto-linked				
Maintain Links				
Queries	Refer To	Tel No.	Business	Unable to contact ?
			NONE	Yes
Money laundering disclosure Record				
Submitting Branch			Submitted By	N Morrison
Submitting Unit Sortcode			Contact No	7-8067-6849
Submitting Department	Payment & Trade Operations		Legislation	POTA
Estimated Laundering Total	180950 <Unknown>			
Reason(s) for Suspicion				
High non cash turnover				
Transactions GBP 0.00				
Date	Type	Amount	Currency	Add
06 Jun 2002	Overseas Credit	180939.00	US Dollar	Edit
Set All Risk Ratings to the same value of:-				
Amber Blue Green Indigo Red				
Personal Data				
Add				

Surname	Forenames	Date Of Birth	Sex	Key Information	Risk	Adj	
HEWITT	IBRAHIM BRIAN		M	NONE	Red	Red	Edit
MUSTAFA	E	17 Nov 1955	M	NONE	Red	Red	Edit
QUNDIL	J		M	NONE	Red	Red	Edit
SADOON	HAMEED THABIT		M	NONE	Red	Red	Edit
SAFIEE	HABIBAH		M	NONE	Red	Red	Edit
Business Data							Add
Business/Org Name	Company Ref. No.	Legal Jurisdiction	Key Information	Risk	Adj		
PALESTINIANS RELIEF & DEVELOPMENT FUND		UNITED KINGDOM	NONE	Red	Red		Edit
Telephone Data							Add
-None-							
Address Data							Add
Bldg No. & Name	Street	Town	Postcode	Risk	Adj		
CLARK CRT	STILTON CRES	LONDON	NW10 8DJ	Red	Red		Edit
PO BOX 333	LONDON		UNDEFINED	Red	Red		Edit
Account Data							Add
Account Name	Account No.	Sortcode	Account Type	Currency	Risk	Adj	
PALESTINIANS RELIEF & DEVELOPMENT FUND	140-00-04156838	60-08-22	Currency Account	US Dollar	Green	Green	Edit
Miscellaneous Data							Add
-None-							
Case Notes							Add
Type	Date	User	Text				
Case notes	17 Sep 2003	Migrated	see case 617044 JC has disclosed on all accounts in a defens				View
Summary and Assessment	17 Sep 2003	Migrated	Further to our disclosure NI 142909, a large international p				View
Conclusion	17 Sep 2003	Migrated	On the basis of the information available to us at the prese				View
Key Correspondence							
Upload Doc Title	Author	User	Date				Add
letter to RM	RBS\Mcomcl	GK2	09 Jul 2002				View Edit
memo from RM	RBS\Mcomcl	GK2	10 Sep 2002				View Edit
chaser to RM	RBS\Mcomcl	GK2	01 Aug 2002				View Edit
explanation from cust	RBS\Mcomcl	GK2	10 Sep 2002				View Edit
expl from cust	RBS\Mcomcl	GK2	10 Sep 2002				View Edit
expl from cust	RBS\Mcomcl	GK2	10 Sep 2002				View Edit

expl from cust	RBS\Mcomcl	GK2	10 Sep 2002	View	Edit
SUSPICION REPORT	RBS\Allenbc	GK2	12 Jul 2002	View	Edit
SUSPICION REPORT	RBS\Allenbc	GK2	12 Jul 2002	View	Edit
NCIS Disclosures					
Author Date					
NCIS Disclosure 207993 (R) RBS\Mcomcl 17 Jun 2002 Amend NCIS Number					
No CIFAS Reports					

1. User: Migrated

On: 17 Sep 2003 00:00

Print Copy

Note: see case 617044 JC has disclosed on all accounts in a defensive disclosure Oct 2001. Have ordered ledgers on sterling accounts and transactions are of the same vein so will not add value to disclosure to include them again. 4/7/02 - Disclosure confirmed. I can't see from the previous case what action, if any, we requested the RM to undertake. Given the background we should be seeking a detailed report from the RM on his knowledge of these customers. Place on spreadsheet and ensure we receive a response - I will need to comment on the High profile report. DH 5/8/02 - NCIS acknowledgement recd, ref 207993, passed to Special Branch. 6.8.02 spoke to Terry they have received a six page document regarding the \$180K payt, it should be received at this office within next week. CLM10/9 - Paperwork received advising that the US dollar payment represented a donation from an aid agency in Yemen - they are a regular donor. Monies said to be for health, medical, and education projects. Looking at the US dollar account there are a number of subsequent payments to hospitals, for example, which would tend to substantiate the comments. Copies of the relevant paperwork have been scanned to the case. DH17/9/03 - When completing a further disclosure on this connection - see Goalkeeper Ref 710368 - a review of all linked disclosures was undertaken. The USD payment of 180,939 originated from the Islamic Charitable Society for the Support of Al-Aqsa. This organisation, albeit not at the time in June 2002, now appears on a list of named/suspected terrorists. GRM 29-05-03. I have spoken to Mark Ashtown (0207 230 3302) at NTFIU Special Branch and confirmed the above which he noted with interest. He did not support the need for a further disclosure at this point but advised that his investigations are ongoing and the bank may receive a further Production Order in due course. TOH

1. User: Migrated	On: 17 Sep 2003 00:00	Print	Copy	Details
<p>Note: Further to our disclosure NI 142909, a large international payment has been received to the US\$ account on 6.6.02 for \$180,939 remitter details Hameed Thabit Sadoon, Saba Islamic Bank, Sana'a. A review of the sterling account has shown no significant change in turnover. We are reporting as the international payment is not in keeping with the size of payment seen previously.</p>				

<https://www.gk3.web.rbsgrp.net/GK3Web/casemaint/CaseMaintNotesViewData.jsp?c...> 01/07/2008

HIGHLY CONFIDENTIAL

NW 052078

1. User: Migrated

On: 17 Sep 2003 00:00

Print Copy

Note: On the basis of the information available to us at the present time, it is considered that the above incident / activity may constitute or involve money laundering and consequently a disclosure has been made to the National Criminal Intelligence Service or other appropriate authorities. Please see attached documents for further information concerning the financial disclosure. This information may be of relevance when considering any business approaches or dealings with the above named parties.

Memorandum

To: Belinda Lane
Branch/ North East Thames CBC
Unit: 01-81-68
From: C McComas
Date: 09.07.02



Group Investigations & Fraud

Ground Floor
Regents House
PO Box 348
42 Islington High Street
London N1 8XL

Telephone: 020 7615 7246
Switchboard: 020 7833 2121
Facsimile: 020 7615 7287

Re: Money Laundering Suspicion

Account: Palestinians Relief & Development Fund 60-08-22

Group Fraud Ref: 666814

We refer to your/the attached report and advise the following:

- The decision has been taken to report the matter to the Authorities. The matter must be treated in the strictest confidence and under no circumstances should the account holder be advised of this action.
- Please update 'Know Your Customer' details and obtain an explanation for the transactions. Should you remain suspicious following your interview with the customer please revert to GI&F with a full explanation of your concerns.
- Please ensure you review the Bank's 'Know Your Customer' and Due Diligence in respect of this connection. You may wish to consider exiting the relationship unless you are entirely happy with your findings.
- We consider this connection presents a serious risk to the Group, accordingly it is our view that you should exit the relationship at the earliest opportunity. You may wish to use the attached wording.
- Please monitor the activity on this account and revert to Group Investigations & Fraud if the activity alters significantly giving further cause for concern.
- You may continue to operate the account within normal banking practice unless you hear from us to the contrary. Please forward a detailed report on your knowledge of this customer and the activities seen on the accounts.

Please note it is an offence to advise the customer or any other 3rd party of your report to us, that a report has been made to the authorities, or of any subsequent investigation.

Thank you for your assistance

Signed:

The Royal Bank of Scotland Group plc
Registered in Scotland No 45581
Registered Office: 36 St Andrew Square Edinburgh EH2 2YB



Your ref:
Our ref:

Ms C McCanns
Fraud Officer
Group Investigations & Fraud
Regents House
42 Islington High Street
London
N1 8XL

9 August 2002

Commercial Banking
Greater London East,
Commercial Banking Centre
PO Box 2401, 1st Floor
10 South Street
Romford
Essex RM1 1BD
E-mail: Belinda.Lane@rbs.co.uk

Telephone: 01708 774634
Fax number: 01708 733816

Dear Charlotte

Group Fraud Ref 666814 – Palestinian Relief & Development Fund

Further to your letter dated 1 August I have obtained the following information regarding the inland payment for US\$180k received on 6 June:-

1. The payment was a donation
2. The remitter was the Islamic Charitable Society for supporting Alqsa Al-Shareef (a holy shrine in Jerusalem)
3. The payment originated from Yemen
4. The party is a regular donor

I have enclosed further information from our customers in this respect.

Yours sincerely

Belinda Lane
Commercial Manager

National Westminster Bank Plc ("NWBPLC") is a member of the NatWest and Eurotower Banking Group. The only packaged products NWBPLC sells are those of the Banking Group, whose members are regulated by the Financial Services Authority. NatWest Stockbrokers Limited is also a member of the London Stock Exchange.

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Agency agreements and branches members of The Royal Bank of Scotland Group.



Your Ref:

Our Ref: 666814

Date: 01.08.02

Group Investigations & Fraud

Regent's House
42 Islington High Street
London N1 8XL

Telephone: 020 7615
Switchboard: 020 7615 7267
TTS 770
Facsimile: 020 7615 7283

Belinda Lane
Greater London East Corporate Banking Centre
PO BOX 2401
1st Floor
10 South Street
ROMFORD

RE PALESTINIAN RELIEF & DEVELOPMENT FUND

GROUP FRAUD REF 666814

Belinda

Thank you for forwarding a copy of your findings regarding the above customer.

As you are aware City IBC instigated the suspicion report as a result of the large inland payment for US\$180K. As this is significantly in excess of other payments we will require further information regarding the transaction.

Please identify the following;

- 1 Was the payment a donation?
- 2 Who was the remitter?
- 3 Where did the payment originate?
- 4 Is this party a regular donator?

I understand you are on annual leave at this time, however would appreciate a reply in writing as a matter of urgency on your return. Thank you for your continued assistance in this matter.

Regards Charlotte McComas
Fraud Officer

13:36

BT

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P. I



INTERPAL
المجلس الفلسطيني لإجلاله و التمكين
RELIVING PALESTINIANS IN NEED

BELINDA LANE
NATWEST PLC
ROMFORD
RM1 1HD
FAX NO: 01708-733 816

P.O. Box 3333
LONDON
NW5 1RW
Tel: 020 8450 8002
Fax: 020 8450 8004
Email: info@interpal.org
Website: www.interpal.org

Our Ref: (7805)
Date: 6 August 2002

Dear Belinda,

Transfer from Abroad: Your Query

Further to your query and our telecon yesterday, please find attached correspondence relating to the transfer that is the subject of your query.

I confirm that the transfer of £180,939.03p is a donation from a aid agency in Yemen called the Islamic Charitable Society for the Support of Al-Aqsa Al-Shareef (the holy Aqsa Mosque) for charitable and humanitarian projects as detailed in the translation of the correspondence attached. In brief, the funds are for health and medical, and education projects.

Please find attached 6 pages of our letter of acknowledgement and receipt to them, and a copy of the transfer document that they forwarded to us. All the documents are accompanied by translations.

I trust this is what you require. Please do not hesitate to contact me should you need further information.

Yours sincerely;

Mr. E. Mustafa
Vice-Chair of the Board of Trustees

Registered Charity No. 1040094

13:36

AT

0000

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Brief Translation of document no 1
Interpal's acknowledging letter to ...

The Islamic charitable society for the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque).

The Republic of Yemen.

Subject: receiving the sum of (\$ 181,000.00)

We have received from you the sum of (\$181,000.00) one hundred and eighty one thousand dollar and that is for the following projects:

1. \$141,000.00 in supports for hospitals and medical centres and orphanage homes in the west bank and Gaza.
2. (\$10,000.00) in support of the family educational centre in the west bank and Gaza.
3. (\$20,000.00) support for the summer centres in the west bank and Gaza.
4. (\$10,000.00) support for the school kit project in the west bank and Gaza.

Please find enclosed a receipt no: (16-02)

Our brothers and sisters we do appreciate the effort you make in helping your brothers and sisters in Palestine. We would also like to assure you that each penny goes toward helping them.....

13:36 RT

0000

p. 6

Brief Translation of document no 2
Interpal's acknowledging letter to ...

Receipt no: 16-02
Dated : 05/06/02

We acknowledge the transfer made by The Islamic charitable society for
the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque). The
Republic of Yemen.

The amount of : (\$181,000.00)
Method of payment: bank transfer
Projects implementations:

In supports for hospitals and medical centres and orphanage homes in the
west bank and Gaza.

In support of the family educational centre in the west bank and Gaza.

In Support for the summer centres in the west bank and Gaza.

In Support for the school kit project in the west bank and Gaza.

Received by: the Palestinian Relief and Development Fund.

13:37 AT

0000

P. 8

Brief Translation of document no 3
Interpal's acknowledging letter sent by The Islamic charitable society for
the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque). The
Republic of Yemen

5. \$141,000.00 in supports for hospitals and medical centres and orphanage homes in the west bank and Gaza.
6. (\$10,000.00) in support of the family educational centre in the west bank and Gaza.
7. (\$20,000.00) support for the summer centres in the west bank and Gaza.
8. (\$10,000.00) support for the school kit project in the west bank and Gaza.
 - a) Required one letter of acknowledgment for the whole amount and the exact amount of money as above and a receipt.
 - b) Reports from all benefited documented with photographs project implementation and preferably accompanied with videos, letter of thanks from all of them.

Official
stamp

Dated :02/06/02

The English writing is the bank payment copy showing all the details.

IBC 666814 HP

617C44

The Royal Bank
of Scotland

Corporate Banking Money Laundering Suspicion Report Form

Surname/Business name <i>Palestinian Development Fund - Interpal</i>		Forename(s)	Post Code
Male/Female	Nationality (if known)	Date of Birth	
Address (include postcode) PO Box 3333 London NW6 1RW		Additional/Previous Address(es) Required Flat 6c Black Court Stilton Crescent London NW6/0 - 8D5	
Telephone No:		Companies - Date of Country of Incorporation/Registered No:	
No & Country of Issue of Passport or other ID document seen/source of introduction/reference taken:			
Account No(s) 1. 95142940 2. 95142975 3. 95142983 4. 95205748		Account Type 140/0/041 56838	Date Opened 550/0/0853 4882
Date when Relationship with Bank started		4/10/1994	
Stated Occupation: as. Name:			
Name & Address of Employer:			
Additional/Associated Names:		Date of Birth:	In Account
			Address, esp P/Codes/Passport No etc.
Details of Transaction		Description	
Date 4/6/2002	Amount US\$ 180950.00	DeCr. cl	Source/Definition e.g. Cash/Cheq/MTS/CHAPS to/from, 1PBBM 020606 02026 Hamed Thabit Sadaan Sanaa Islamic Bank Sana'a
Reasons for Suspicion			
<p>Official Name - E. Mustafa, Ibrahim Ben Hewitt, J. Jurell, Mafough Saifee</p> <p>Direct access customer to IBC S.E.a City When contacted to advise of receipt of money Mr Jurell (see above) commented the funds had been exported from Yemen</p> <p>Connection between Yemen, al Qaeda and present Middle East.</p>			

The Royal Bank
of Scotland

Corporate Banking Money Laundering Suspicion Report Form

Branch/Office of 27/02/2001 notes that a cheque was accepted with payee as "fakied (= Holy Mat)

Security & safe Custody held (brief details only)

Boxes & Parcels held

Special Signing Instructions, e.g. Third party mandates

If a company/partnership etc attach a copy of mandate
Other accounts known to be held (including Building Societies)

Status Enquiries Received

Nature of Suspected Offence <i>Possible embassies - for funding Terrorism in Middle East</i>		Drug Trafficking Terrorism ✓ Other crime
Branch / Depart Ref: <i>IBC CITY</i>	Name of Contact <i>N. MORRISON</i>	Tel/ITS Ext. 7- 8067 -6849
Signed: <i>N Morrison</i>	Senior Officer/Manager	Date <i>7/6/2002</i>

NCIS Disclosure for Case 666814 (Received)

[Close](#) [Print](#)

**Core NCIS details created on 17 Jun 2002 by RBS\Mcocomel
RBS\Hartlida on 04-JUL-02]**

Disclosure Type	Terrorism	Submitting Branch Address	Natwest
Disclosure Date	17 Jun 2002		City IBC
Branch / Outlet	Finsbury Park		
Branch Code	60-08-22		
Trust Indicator	N		
Further Information	Y	Postcode	
Text	Further to our disclosure NI 142909, a large international payment has been received to the US\$ account on 6.6.02 for \$180,939 remitter details Hameed Thabit Sadoon, Saba Islamic Bank, Sana'a. A review of the sterling account has shown no significant change in turnover. We are reporting as the international payment is not in keeping with the size of payment seen previously.		

Associated Subject: HEWITT , IBRAHIM (Person)

Surname	HEWITT	Date of Birth
Forename 1	IBRAHIM	Occupation
Forename 2	BRIAN	Employer
Gender	Male	Association chairman
Information		

Associated Subject: MUSTAFA , E (Person)

Surname	MUSTAFA	Date of Birth	17 Nov 1955
Forename 1	E	Occupation	
Forename 2		Employer	
Gender	Male	Association official	
Information			

Address for E MUSTAFA

Address Line	60 CLARK CRT	Address Type Home
	STILTON CRES	Current Yes
	LONDON	
	UNITED KINGDOM	
Postcode	NW10 8DJ	

Associated Subject: QUNDIL , J (Person)

Surname	QUNDIL	Date of Birth
Forename 1	J	Occupation
Forename 2		Employer
Gender	Male	Association secretary
Information		

Associated Subject: SADOON , HAMEED (Person)

Surname	SADOON	Date of Birth
Forename 1	HAMEED	Occupation
Forename 2	THABIT	Employer
Gender	Male	Association remitter of funds
Information		

Associated Subject: SAFIEE , Mahfouzh (Person)

Surname	SAFIEE	Date of Birth
Forename 1	Mahfouzh	Occupation
Forename 2		Employer
Gender	Male	Association trustee
Information		

(Main Subject) PALESTINIANS RELIEF & DEVELOPMENT FUND (Company)

PALESTINIANS		
Company Name	RELIEF & DEVELOPMENT FUND	Company Number
VAT Number		Country UK
Business Type		Association
Information		

Address for PALESTINIANS RELIEF & DEVELOPMENT FUND

Address Line	PO BOX 3333	Address Type Other
	LONDON	Current Yes
	UNITED KINGDOM	
Postcode	NW6 1RW	

Address for PALESTINIANS RELIEF & DEVELOPMENT FUND

Address Line	60 CLARK CRT	Address Type Registered
	STILTON CRES	Current Yes
	LONDON	
	UNITED KINGDOM	
Postcode	NW10 8DJ	

Transaction for PALESTINIANS RELIEF & DEVELOPMENT FUND

FI Number		Account Opened
Sort Code	60-08-22	Account Closed
Acc. Number	140-00-04156838	Balance
	PALESTINIANS	
Acc. Name	RELIEF & DEVELOPMENT FUND	Balance On
Credit/Debit	Credit	Acc. Currency GBP
Pre 1992	N	

Turnover Credits	Transaction Type Wire Trsfr
Turnover Debits	Transaction Date 06 Jun 2002
Turnover Period	Amount 180939.00
	Currency USD
	Amount (Sterling)